

REMARKS

Reconsideration of this application, in view of the following remarks, is respectfully requested.

Claims 1-43 were originally presented for consideration in this application. No claims have been canceled or added. Accordingly, claims 1-43 are currently pending in this application.

The examiner's indication that claims 2, 4, 6-9, 12, 16-20, 23-28 and 30-43 contain allowable subject matter, is noted with appreciation. The remaining claims 1, 3, 5, 10, 11, 13-15, 21, 22 and 29 stand rejected as being obvious over a combination of U.S. Patent No. 6,394,185 (Constien) and U.S. Patent No. 2,981,332 (Miller).

The invention relates to an expandable well screen which includes a temporary sealing substance preventing fluid flow through a wall of the screen. The screen is then expanded in a well. In independent claims 1 and 29, the temporary sealing substance is impregnated in a filtering layer of the screen. In independent claim 10, the temporary sealing substance is chosen from among a list of substances.

As the examiner correctly states in the Office Action, Constien describes a well screen which has a coating in or on its filtering layer. Miller describes a filtering layer which is expandable in a well. However, the applicants respectfully disagree that it would be obvious to combine the teachings of these references to produce the claimed invention.

First, it is important to understand the purpose for which the coating described by Constien is used. The purpose is to prevent substances in a well (such as drilling

mud, filter cakes, high viscosity pills, etc.) from clogging the screen. For this purpose, the coating includes reactive materials which dissolve the clogging substances. Please see column 2, lines 6-20.

Constien does not use the coating as a seal for preventing flow through the filtering layer of the screen. Instead, Constien uses the coating as a way to deliver the reactive materials to the area around the screen in the well. In fact, the word "seal" does not appear anywhere in the Constien reference. Thus, Constien does not describe a temporary sealing substance which prevents fluid flow through the filtering layer. For at least this reason the examiner is respectfully requested to withdraw the obviousness rejections.

Miller describes a screen with a filtering layer made of an expandable sponge rubber or foam material. The filtering layer is released to expand by dissolving an outer sheath or bands initially restraining the filtering layer.

It is unclear how a person skilled in the art would be motivated to combine the teachings of Miller with those of Constien to produce the invention recited in the independent claims. Clearly, this motivation is not contained in either of the references. Indeed, neither of the references even addresses the problem of preventing flow through the filtering layer of an expandable screen. Instead, Constien is directed to the problem of releasing reactive materials into an area about a screen, and Miller is directed to the problem of expanding a filtering layer of a screen. For this additional reason, the examiner is respectfully requested to withdraw the obviousness rejections.

In view of the foregoing remarks, all of the claims pending in this application are now seen to be in a condition for allowance. A Notice of Allowance of claims 1-43 is therefore earnestly solicited.

The examiner is hereby requested to telephone the undersigned attorney of record at (972) 516-0030 if such would expedite the prosecution of the application.

Respectfully submitted,

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